

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JOEL VANGHELUWE, ET AL.,	§	
	§	2:18-cv-10542-LJM-EAS
Plaintiffs,	§	
v.	§	Hon. Laurie J. Michelson
	§	
GOTNEWS, LLC, ET AL.,	§	Mag. Elizabeth A. Stafford
	§	
Defendants.	§	
	§	

MOTION TO DISMISS DEFENDANT JEFFREY RAINFORTH ONLY

Plaintiffs file this Motion to Dismiss Defendant Jeffrey Rainforth Only and would show the Court as follows:

1. Plaintiffs are Joel Vangheluwe and Jerome Vangheluwe. On February 14, 2018, Plaintiffs sued several defendants, including Defendant Jeffrey Rainforth, for defamation, defamation per se, intentional infliction of emotional distress, and invasion of privacy (false light). On or around July 10, 2018, Defendant Rainforth filed a letter with the Court, which has been considered his answer. Mr. Rainforth has not had an attorney file an appearance and is proceeding *pro se*.

2. Plaintiffs file this Motion to Dismiss Defendant Jeffrey Rainforth as a defendant in this suit. Plaintiff no longer desires to pursue the claims he raised in this matter against Defendant Jeffrey Rainforth. Plaintiffs ask that each side bear their own attorneys' fees and costs.

3. For these reasons, Plaintiffs request this Court dismiss, without prejudice, all of the claims that Plaintiff raised against Defendant Jeffrey Rainforth.

Respectfully submitted,

**Sommerman, McCaffity,
Quesada & Geisler L.L.P.**

/s/ Andrew B. Sommerman
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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

Counsel for Plaintiffs has been unable to confirm with Defendant Jeffrey Rainforth on this motion. Counsel for Plaintiffs does not have a phone number or an email address for Defendant Jeffrey Rainforth. Counsel for Plaintiffs only has a mailing address. Should Counsel for Plaintiffs receive a response to this Motion, they will advise the Court.

/s/ Andrew B. Sommerman
Andrew B. Sommerman

CERTIFICATE OF SERVICE

The undersigned certifies that on February 26, 2020, the foregoing Motion to Dismiss Defendant Jeffrey Rainforth Only was served via ECF on counsel of record who have appeared in the case.

Furthermore, on February 26, 2020, I affirm that I placed a true and accurate copy of this document in a First Class postage-prepaid, properly addressed, and sealed envelope which was addressed to: Jeffrey Rainforth, [REDACTED] H. St., Apt. [REDACTED], Sacramento, CA [REDACTED].

/s/ Andrew B. Sommerman
Andrew B. Sommerman